RETAIL ENERGY CODE

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01	Proposal Plan
02	**Impact Assessment**
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0254 – NON-DOMESTIC CHANGE OF OCCUPIER REPORTING (R0155 SOLUTION)

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	07/11/2025
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	PERFORMANCE ASSURANCE BOARD	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	MEDIUM	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	ENERGY SUPPLIERS		

LEAD ANALYST (SOLUTION LEAD)	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This Issue introduces the reporting required as part of the ongoing Performance Assurance monitoring of the Non-Domestic Change of Occupier process and the R0155 – Change of Occupier Evidentiary Standards and Timescales solution.

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BACKGROUND

1 SUMMARY

As part of the R0155 change process, the REC Performance Assurance Board requested ongoing monitoring reporting to identify outliers or abnormal behaviour which the Code Manager would then follow up in detail. However, this planned reporting by Energy Suppliers was descoped from R0155 due to the ongoing development of an Ofgem Reporting Request for Information (RFI) (titled Non-Domestic Market Monitoring Request for Information).

The Ofgem RFI includes data received from Energy Suppliers relating to the time taken for a Non-Domestic Consumer's Change of Occupier request to be completed, in order to simplify the process for Energy Suppliers., REC Performance Assurance intend on using the same data. This reduces the need to make two related, but different reports in the same topic areas. The Code Manager intended to use the reporting from the Ofgem RFI for ongoing Performance Assurance monitoring of the Non-Domestic Change of Occupier process. However, this was not confirmed by Ofgem in time for the R0155 implementation, as such this separate REC Change Proposal is required to include this data as part of the ongoing Performance Assurance monitoring.

The Ofgem reporting RFI was finalised and issued to Energy Suppliers on 11 March 2025. Energy Suppliers will be responding on 28 May for Q1, 14 August for Q2, and 14 November for Q3, however the RFI may still be subject to Change. The Q3 reporting would be the first set of reporting that would include data following the implementation of R0155 on 27 June 2025.

2 PROBLEM STATEMENT

REC Performance Assurance Board (PAB) confirmed during the R0155 change process that they wanted to monitor the R0155 solution going forward. The planned reporting by Energy Suppliers was descoped from R0155 due to the ongoing development of an Ofgem Reporting Request for Information (titled Non-Domestic Market Monitoring Request for Information). Without the Ofgem RFI data being submitted, or an alternative means of receiving or reporting Non-Domestic Change of Occupier data, REC Performance Assurance are unable to complete the ongoing monitoring activity originally requested by the (PAB).

3 IMPACTS

CONSUMERS
Non-Domestic Consumers

RECCO / REC CODE MANAGER
REC Performance Assurance

REC PARTIES AND SERVICE USERS
Energy Suppliers

REC DOCUMENTS / PRODUCTS
Performance Assurance Reporting Catalogue (PARC)

MHHS DESIGN
No impacts.

MHHS DATA SPECIFICATION
No impacts.

MHHS CODE DRAFTING
No impacts.

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified by the Code Manager.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**04 May-25**	**30 Jul-25**
	Solution Development	Completed	Completed
	Party Impact Assessment	June	June
	Service Provider Impact Assessment	June	July
	Solution Refinement	July	July
Change Proposal		**31 Jul-25**	**29 Sept-25**
	Business Case Assessment	July	August
	Consultation	August	August
	Final Determination	September	September
Voting		**30 Sept-25**	**30 Sept-25**
	Appeal Window	01 October	15 October

The Code Manager has set a Proposal Plan in preparation for a proposed implementation as part of the standard November 2025 REC Release.

During the change process for R0155, the Code Manager made a commitment to implement the Non-Domestic Change of Occupier Reporting Change Proposal as soon as possible after the implementation of R0155. This Proposal Plan has been proposed to ensure this commitment can be met.

6 STAKEHOLDER ENGAGEMENT

Stakeholder engagement on the reporting requirements for the Non-Domestic Change of Occupier process took place during the R0155 change process. Further details of this can be found in section 8 of this Change Report and the R0155 Change Report (Final Recommendation).

The Proposal Plan for I0254 ensures further stakeholder engagement via a Party impact assessment and an industry consultation. Where required, the Code Manager will also engage with the REC Change Issues Group.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	0	17	0
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	2	10	20
				Overall Priority Score (rounded)	118

Priority Status	MEDIUM
Change Proposal Type	STANDARD

This Issue has been given a priority status of medium based upon a weighted prioritisation score of 118.

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

Solution analysis for this change took place during the solution development, and wider change process, for R0155 – Change of Occupier: Evidentiary Standards and Timescales. During this stage, the Code Manager initially consulted with the PAB on 30 July 2024 setting out options for assuring the amendments to the Change of Occupier process. There was significant focus from the PAB on preventing any issues, and having data led monitoring of performance across the market. In particular, the PAB requested ongoing monitoring to identify outliers or anomalous behaviour, which the Code Manager would then follow up in detail in line with existing Performance Assurance Methodology and Techniques.

Following further analysis during the stakeholder engagement activities of the R0155 change process, including further consultation with the PAB, the Code Manager determined that the most appropriate method of assessing compliance was through direct sampling of Energy Supplier compliance based upon pre-existing market data. This included data received from Energy Suppliers on the time taken for a Non-Domestic Consumer's request to agree to a Change of Occupier. The information would be requested by Ofgem as part of their Non-

Domestic Market Monitoring RFI, and to simplify the process for Energy Suppliers, the Code Manager made a commitment to request the same data, thus reducing the need to make two related but different reports in the same topic area. This approach gathered industry support during the consultation for R0155.

The Code Manager explored the most suitable approach to achieve this. However, the Ofgem RFI would not be confirmed prior to the Final Recommendation for R0155. Consequently, the updates to the PARC, to include direct reference to the Ofgem RFI, could not be implemented until after the R0155 implementation date. As such, the Code Manager agreed to raise a subsequent, separate Change Proposal, to update the PARC following the confirmation, issuing, and first submission of the Ofgem RFI.

9 PROPOSED SOLUTION

One of the following two options would ensure the appropriate data from the Ofgem Non-Domestic Market Monitoring RFI is used for the ongoing Performance Assurance monitoring activities including the backdating of reporting for the period between the implementation of R0155 and the proposed implementation of I0254:

1) Incorporating the Ofgem Reporting RFI Non-Domestic Change of Occupier data into the Performance Assurance Reporting Catalogue (PARC) (that would require Parties to submit the data via the REC Portal).
2) Scope out the development of a process of a formal agreement between Ofgem and the REC Code Manager to allow Ofgem to share the Non-Domestic Change of Occupier data directly with the Code Manager to reduce the burden on Energy Suppliers and save them from having to duplicate submissions.

10 DRAFT LEGAL TEXT

An extract of Ofgem Non-Domestic Market Monitoring RFI template containing the requirements for the Change of Occupier (referred to in the template as Change of Tenancy) can be found here.

No legal text changes to existing REC Schedules (including the new Non-Domestic Change of Occupier Schedule due to be implemented on 27 June 2025) are anticipated with this Change. However, under the first solution option listed in Section 9 of this Change Report, the PARC would be updated to include the data requested under the Ofgem RFI.

To support REC Parties in preparing for the update to the PARC following the Ofgem RFI (including with their preparations and system changes for R0155), and assist with the Party impact assessment for I0254, an example of what the PARC may look like can be seen below. To ensure that the request is in line with the Ofgem RFI, the PARC will not specify the exact data items, but rather just the information as required by Ofgem in the RFI.

Please note, this is only a hypothetical template of what may be included in the PARC as a result of this Issue. A full draft version of amendments to the PARC will be made available during the consultation for I0254, should a formal agreement between Ofgem and the REC Code Manager not proceed.

Ref #	Data Category	Data Item	Description	Provided by which REC Party	Frequency	Date First Required	Pre-Existing	Prepayment Meters Only?	Domestic	Micro-Business	Commercial	REC Obligations	Retail Risk
1451	Change of Occupier Request	COO Aggregate Data	Non-Domestic RFI, Change of Tenancy (Electricity) tabs, as specified by Ofgem.	Suppliers	The month of the next reporting cycle following the due date of the Ofgem RFI.	Per Ofgem RFI	N	No	N	Y	Y	Schedule X Non-Domestic Change of Occupier Schedule	II. Retail market processes are not effective or efficient, including the incomplete or inaccurate updating of REC data. III. Consumer interests and data are not protected in the operation of the REC.
1452	Change of Occupier Request	COO Aggregate Data	Non-Domestic RFI, Change of Tenancy (Gas) tabs, as specified by Ofgem.	Suppliers	The month of the next reporting cycle following the due date of the Ofgem RFI.	Per Ofgem RFI	N	No	N	Y	Y	Schedule X Non-Domestic Change of Occupier Schedule	II. Retail market processes are not effective or efficient, including the incomplete or inaccurate updating of REC data. III. Consumer interests and data are not protected in the operation of the REC.

11 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

11.1 RISKS AND ISSUES

No risks or issues have been identified at this stage.

11.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
I0254.A001	Backdated Reporting	It is assumed that REC Performance Assurance will require backdated reporting of an Energy Supplier's Change of Occupier's. The assumed date that the data will need to be backdated would be a date as close to the R0155 implementation as possible that also recognises that the Ofgem RFI is quarterly.	This will be confirmed during the Business Case Assessment and will be consulted on.

NO.	DEPENDENCY	NOTES	STATUS
I0254.D001	Formal Agreement with the Authority	The chosen solution, and the requirements for Energy Suppliers, will be dependent upon whether formal agreement to share the Ofgem Non-Domestic RFI between the Authority and the Code Manager is put in place.	Ongoing – final solution to be confirmed following engagement between Code Manager and the Authority.

12 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGES	R0155 – Change of Occupier: Evidentiary Standards and Timescales I0232 – Non-Domestic Change of Occupier SDEP Screens (R0155 Solution)
OFGEM NON-DOMESTIC RFI (CHANGE OF OCCUPIER REPORTING EXTRACT)	Link
ANY OTHER DOCUMENTS / LINKS	R0155 – Change Report (Final Recommendation) Non-Domestic Change of Occupier Schedule (to be implemented 27 June 2025) Performance Assurance Reporting Catalogue Performance Assurance Methods and Techniques

13 GLOSSARY

TERM	DEFINITION
Change of Occupier	means that the Consumer at a premises has changed (or is due to change).
Non-Domestic Consumer	has the meaning given to 'Non-Domestic Customer' in the Energy Supply Licences.
Office of Gas and Electricity Markets (Ofgem)	Ofgem is the regulator for Britain's gas and electricity industries overseen by the Gas and Electricity Markets Authority (the Authority).
Performance Assurance	means the activities undertaken by the Code Manager and the REC PAB in accordance with the Performance Assurance Schedule.
Performance Assurance Technique	means any provision or process that may be employed by the REC PAB and/or the Code Manager in order to mitigate Retail Risks in accordance with the Performance Assurance Schedule.